

## DeJong, Stephanie

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**From:** Gieck, Stephanie  
**Sent:** Tuesday, December 10, 2013 1:31 PM  
**To:** pclark@cheyennebopu.org  
**Subject:** Refinery Pretreatment Regulations - Stormwater

Hi Phil,

I'm trying to finish up the pretreatment compliance inspection report. I apologize for it taking so long, but the shutdown really put a lot of things with my cases behind.

I want to correct a preliminary finding we mentioned in our close out. We mentioned that stormwater and wastewater from the refining process were being discharged through the monitoring point, and that the stormwater was not accounted for as a dilution flow. The categorical limits for pretreatment apply to "total refinery flow." I've been reading through the development documents, Federal Register notices, and talking to others at EPA to determine if "total refinery flow" includes stormwater. Stormwater was clearly contemplated as part of the rulemaking, because the direct discharge standards have specific stormwater limits. Based on what I've seen, it appears that the term "total refinery flow" includes stormwater from the refinery (not stormwater from their administration building, etc.). The documents talk about how older refineries have combined storm and process sewer systems, and it was infeasible for existing direct dischargers to separate them. I assume the same thing was assumed for existing indirect dischargers. If I find something out that contradicts this, I will let you know. At this point, this finding will not be in the inspection report.

Let me know if you have any questions about this.

Thanks,

Stephanie Gieck

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